

The Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BYRON BOYD,

Plaintiff,

vs.

UNITED TRANSPORTATION UNION  
INSURANCE ASSOCIATION, UNITED  
TRANSPORTATION UNION PENSION  
ADMINISTRATIVE COMMITTEE, PAUL  
THOMPSON and RICK MARCEAU

Defendants.

No. C05-1413 JLR

**STIPULATED MOTION AND  
[PROPOSED] ORDER TO  
EXTEND COURT DEADLINES**

Note on Motion Calendar:  
March 6, 2006

**I. STIPULATED MOTION**

The parties hereby stipulate to and move for an order extending the outstanding deadlines in the Minute Order dated December 13, 2005 as follows:

- (1) That the deadline for all motions related to discovery must be filed by and noted on the motion no later than the third Friday after April 13, 2006;
- (2) That the deadline by which discovery must be complete is moved from March 13, 2006 to May 15, 2006;
- (3) That the deadline by which all dispositive motions must be filed and noted on the motion calendar no later than the fourth Friday thereafter (see CR 7(d)) is moved from April 12, 2006 to June 12, 2006;

- (4) That the deadline for the settlement conference per CR 39.1(c)(2) is moved from May 12, 2006 to July 14, 2006;
- (5) That the deadline for the mediation per CR 39.1(c)(3) is moved from June 12, 2006 to August 14, 2006;
- (6) That the deadline by which all motions in limine must be filed and noted on the motion calendar no later than the second Friday thereafter is moved from June 13, 2006 to August 14, 2006;
- (7) That the deadline for the agreed pretrial order is moved from June 29, 2006 to August 29, 2006;
- (8) That the date for the pretrial conference is moved from July 5, 2006 at 03:00 p.m. to a date so designated by the court;
- (9) That the deadline for trial briefs, voir dire questions, proposed jury instructions, and trial exhibits is moved from July 6, 2006 to a date so designated by the court;
- (10) That the trial date is moved from July 11, 2006 at 09:00 a.m. to a date so designated by the court.

The parties make this motion to forego incurring fees and costs until after the Court rules upon defendants' Motion to Dismiss.

IT IS SO STIPULATED:

THE HEEKIN LAW FIRM

By: /s/ Katherine Heekin  
Katherine Heekin, WSBA #28908  
121 SW Morrison St., Suite 600  
Portland, OR 97204  
Phone: 503-222-5578  
Fax: 503-914-1889  
Email: [Katherine@HeekinLawOffice.com](mailto:Katherine@HeekinLawOffice.com)  
Attorney for Plaintiff

SONG MONDRESS PLLC

GUERRIERI, EDMOND, CLAYMAN &  
BARTOS, P.C.

By: /s/ Michael P. Monaco  
Michael P. Monaco, WSBA #24460  
720 Third Avenue, Suite 1500  
Seattle, WA 98104  
Phone: 206-398-1500  
Fax: 206-398-1501  
Email: [mmonaco@songmondress.com](mailto:mmonaco@songmondress.com)

Attorney for Defendants United  
Transportation Union Pension  
Administrative Committee,  
Paul Thompson and Rick Marceau

By: /s/ John A. Edmond  
John A. Edmond, Pro Hac Vice  
1625 Massachusetts Ave. NW, Suite 700  
Washington, D.C. 20036  
Phone: (202) 624-7400  
Fax: (202) 624-7420  
Email: [jedmond@geclaw.com](mailto:jedmond@geclaw.com)

David Campbell, WSBA #13896  
18 West Mercer Street, Suite 400  
Seattle, WA 98119  
Phone: (206) 285-2828  
Fax: (206) 378-4132  
Email: [campbell@workerlaw.com](mailto:campbell@workerlaw.com)

Attorneys for Defendant United Transportation  
Union Insurance Association

## II. ORDER

Pursuant to the foregoing stipulation of the parties, IT IS SO ORDERED that the following scheduling dates shall apply:

- (1) All motions related to discovery must be filed by and noted on the motion no later than the third Friday after April 13, 2006;
- (2) Discovery must be complete by May 15, 2006;
- (3) All dispositive motions must be filed and noted on the motion calendar no later than the fourth Friday after June 12, 2006;
- (4) Settlement conference per CR 39.1(c)(2) must occur by July 14, 2006;
- (5) Mediation per CR 39.1(c)(3) must occur by August 14, 2006;
- (6) All motions in limine must be filed and noted on the motion calendar no later than the second Friday after August 14, 2006;

- (7) Agreed Pretrial Order due by August 29, 2006;
- (8) Pretrial conference is set for 9/6/06 at 9:00 a.m.;
- (9) Trial briefs, voir dire questions, proposed jury instructions, and trial exhibits due by 9/12/06;
- (10) Trial Date is set for 9/19/06 at 9:00 a.m.

Dated this 7th day of March, 2006.



JAMES L. ROBART  
United States District Judge

Presented by:

THE HEEKIN LAW FIRM

By: /s/ Katherine Heekin  
Katherine Heekin, WSBA #28908  
121 SW Morrison St., Suite 600  
Portland, OR 97204  
Phone: 503-222-5578  
Fax: 503-914-1889  
Email: Katherine@HeekinLawOffice.com  
Attorney for Plaintiff